

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Darese Deandre HAILE

Case No. Case: 2:22-mj-30495

Judge: Unassigned,
Filed: 11-10-2022

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 12, 2022 and October 3, 2022 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 2119

Carjacking

This criminal complaint is based on these facts:

Continued on the attached sheet.



Complainant's signature

Special Agent Rohit Joshi - ATF

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: November 10, 2022

City and state: Detroit, Michigan



Judge's signature

Honorable Kimberly G. Altman, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Rohit Joshi, being duly sworn, depose and state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF), and have been since August of 2016. I am assigned to the Detroit, Michigan, Field Division, Group I. I investigate violations of firearms and narcotics laws. I have participated in numerous investigations that involved violations of federal firearms and narcotics laws. I have completed the Criminal Investigator Training Program, Special Agent Basic Training, and the Michigan Law Enforcement Basic Training Academy. During the course of my employment with ATF, I have investigated criminal violations relating to firearms, explosives, arson, violent crime, criminal street gangs and narcotics. I received training on firearms identification, common scenarios involving firearms and narcotics trafficking, and identification and effects of controlled substances. I am familiar with, and have participated in, conventional investigative methods, including, but not limited to, electronic surveillance, visual surveillance, the use of GPS/E-911 data, questioning of witnesses, search warrants, confidential informants, and pen registers and trap and trace devices. Additionally, I received training on undercover investigations related to firearms and narcotics trafficking.

2. I am a former Wayne State University Police Officer, Detroit, Michigan. I held the position of a Police Officer and Sergeant for approximately ten years, and for six years served as a Task Force Officer (TFO) with the Detroit Police Department's Commercial Auto Theft Section/Carjacking Unit. During this employment, I conducted numerous investigations for state and federal violations related to firearms, narcotics, carjacking, armed robbery, auto theft, insurance fraud, and motor vehicle title fraud.

3. The facts in this affidavit come from my personal observations, training, experience, and information obtained from other agents/officers. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all of facts known to law enforcement related to this investigation.

4. This affidavit is made in support of a criminal complaint charging Dares Deandre HAILE (DOB: XX/XX/2001) with violations of 18 U.S.C. § 2119 (Carjacking).

II. PROBABLE CAUSE

5. As a part of this investigation, I reviewed HAILE's computerized criminal history, which showed that HAILE was sentenced to HYTA Probation with the Michigan Department of Corrections (MDOC) on October 27, 2021. HAILE is on supervised probation with MDOC with an effective date of October

27, 2021, and an expiration date of November 10, 2024. A term of his probation prohibits HAILE from owning, using, or having control of a weapon of any type.

6. As part of this investigation, I know that the Ford Escape and Mazda 6 stolen during the carjackings described below were manufactured outside of the state of Michigan, and therefore had been transported, shipped, or received in interstate or foreign commerce.

A. May 12, 2022 Carjacking

7. On May 12, 2022, at approximately 12:38 a.m., a Lyft user requested a ride at or near 55XX Pennsylvania Street, Detroit, Michigan. At approximately 12:44 a.m., Adult Victim-1 (AV-1), a Lyft driver, responded to the ride request and went to pick up the fare in his 2016 red Ford Escape. When AV-1 arrived at the pick-up address, two unknown black male suspects approached AV-1, each brandishing a handgun. The suspects demanded that AV-1 give them money. AV-1 complied and provided the suspects with \$900.00 in U.S. currency. The suspects then instructed AV-1 to exit his vehicle and take his pants off. AV-1 complied and provided his pants to the suspects. The suspects then entered AV-1's vehicle and fled the location. AV-1 ran down the street to an address on Gratiot Avenue in Detroit, Michigan and called the Detroit Police Department.

B. June 8, 2022 Carjacking

8. On June 8, 2022, at approximately 2:46 a.m., a Lyft user requested a ride at or near 40XX Field Street, Detroit, Michigan. At approximately 2:58 a.m., Adult Victim-2 (AV-2), a Lyft driver, responded to the ride request and went to pick up the fare in his 2021 blue Dodge Durango. When AV-2 arrived at the pick-up address, two unknown black male suspects approached AV-2, each brandishing a handgun. AV-2 turned around and the suspects instructed AV-2 to place his hands on the steering wheel. AV-2 complied, and the suspects ordered AV-2 out of the vehicle and instructed AV-2 to take off his clothing and provide it to them. The suspects then entered AV-2's vehicle and fled the location. AV-2 ran down the street to an address on Gratiot Avenue in Detroit, Michigan and called the Detroit Police Department.

C. June 9, 2022 Carjacking

9. On June 9, 2022, at approximately 3:06 a.m., a Lyft user requested a ride at or near 18XXX Gallagher Street, Detroit, Michigan. At approximately 3:22 a.m., Adult Victim-3 (AV-3), a Lyft driver, responded to the ride request and went to pick up the fare in his black 2021 Dodge Ram 1500. AV-3 was approaching a stop sign when he observed someone waving a flashlight behind him. AV-3 turned around and observed two (2) black males waiting. AV-3 requested to see their Lyft account which the suspects showed AV-3. Subsequently, AV-3 allowed the

suspects to enter the vehicle, a black 2021 Ram 1500. The suspects entered the rear seat of the AV-3's vehicle and both suspects brandished a handgun and stated, "Give us everything you have." The suspect (S1) sitting behind the front passenger seat exited the vehicle and walked over to the driver's door and opened it. The second suspect (S2) remained seated in the vehicle and continued to point the handgun at AV-3. S2 ordered AV-3 to exit the vehicle and S2 also exited the vehicle. S2 ordered AV-3 to take off his clothes, shoes, and glasses. AV-3 got onto his knees and said, "Don't shoot me." One of the suspects hit AV-3 in the face with their handgun and subsequently AV-3 blacked out. AV-3 regained consciousness and started to walk away from the vehicle. The suspects entered the vehicle and fled the location. AV-3 ran down the street to "United Grill" and called the Detroit Police Department. Detroit Police officers responded to the carjacking scene. The officers located AV-3's clothes, shoes, and glasses on the street in front of the Gallagher Street address.

D. October 3, 2022 Carjacking

10. On October 3, 2022, a Lyft user named "Travis" requested a ride at or near 18XXX Wexford Street, Detroit, Michigan at approximately 3:06 a.m. At approximately 3:18 a.m., a Lyft driver (AV-4) responded to the ride request in his 2017 black Mazda 6. Upon arrival, AV-4 was approached by two black male suspects. One of the suspects (S1) opened the rear passenger door and brandished a

handgun and demanded AV-4 to exit the vehicle and take off his clothing. The second suspect (S2) opened the driver's door and grabbed AV-4 out of the vehicle. The suspects took AV-4's clothing, Apple iPhone, and wallet. Both suspects entered AV-4's vehicle and fled in AV-4's vehicle.

E. Additional Investigation Linking HAILE to the TARGET OFFENSES

11. During June 2022, ATF obtained records from Lyft relating to the Lyft account that requested the ride for the May 12, 2022 carjacking. ATF reviewed the Lyft records, and it was discovered the registered telephone number (XXX) XXX-3304 for the Lyft rider who requested the ride was a Google voice number. Based on my training and experience, I know that Google Inc. generates telephone numbers free of cost. Google voice numbers allow calls, text messaging, and voicemail services and work on smartphones and computer devices. To obtain a Google voice number, an individual is required to have a Google account with Google, Inc.

12. During June 2022, ATF obtained and reviewed records from Google, Inc. for Google voice number (XXX) XXX-3304. The (XXX) XXX-3304 Google voice number is linked to the Google Pay account of Darese HAILE, Tax Number: XXX-XX-7094.

13. During June 2022, ATF queried Accurint, a law enforcement database, relating to HAILE. Per Accurint, HAILE is associated to the address of 80XX

Lamphere Street, Detroit, Michigan and the telephone number (248) 396-8694. In addition, per Accurint, the Social Security Number (SSN) of XXX-XX-7094 is associated to HAILE—the same number as the tax ID number on the Google Pay account.

14. During June 2022, ATF obtained and reviewed call records for the -8694 number associated with HAILE. On June 8, 2022, that number placed outgoing calls to (XXX) XXX-0895—a telephone number associated to Lyft—at approximately 2:57 a.m., 2:59 a.m., and 3:00 a.m. The Lyft driver (AV-2) responded to the ride request at approximately 2:58 a.m. on June 8, 2022, and was subsequently carjacked at gunpoint, as described above. At this time, ATF has been unable to contact AV-2 to confirm whether he received telephone calls around the time of the carjacking.

15. On June 9, 2022 at approximately 3:21 a.m., the -8694 phone number placed an outgoing call to (XXX) XXX-1959—a telephone number associated to Lyft. The Lyft driver (AV-3) responded to the ride request on June 9, 2022 at approximately 3:21 a.m. and was soon carjacked at gunpoint, as described above. On October 14, 2022, I spoke with the AV-3, who stated:

- a. Prior to picking up the suspects on June 9, 2022, he received a phone call and briefly spoke to one of the suspects, because AV-3 had driven past them.

- b. After he received the call, AV-3 saw the suspects waving a flashlight and then backed up his vehicle to pick them up.
- c. When Lyft riders call him or he calls a Lyft rider, the telephone numbers are changed by Lyft for privacy reasons, so the actual telephone numbers of each party are not displayed. Therefore, the (XXX)XXX-1959 Lyft telephone number contacted by the -8694 phone number on June 9, 2022, was not AV-3's cellular phone number, but the call was likely routed to his telephone by Lyft.

16. On July 20, 2022, ATF contacted the -8694 phone number and a male answered the telephone. ATF asked to speak with "Darese HAILE." The male voice that answered the phone acknowledged that he was HAILE.

17. During October 2022, ATF obtained and reviewed call records for the -8694 number associated with HAILE. On October 3, 2022, that number placed outgoing calls to (XXX) XXX-6592—a telephone number associated to Lyft—at approximately 3:17 a.m. The Lyft driver (AV-4) responded to the ride request at approximately 3:18 a.m. October 3, 2022, and was subsequently carjacked at gunpoint, as described above. ATF spoke with AV-4 relating to any incoming call which he may have received prior to the carjacking. AV-4 stated he doesn't remember if he received a call prior to the carjacking.

18. On October 11, 2022, eight days after the October 3, 2022 carjacking, ATF showed a six-person photo array containing a photograph of HAILE and other males who share similar physical characteristics to HAILE to AV-4. AV-4 positively identified HAILE as one of the suspects who carjacked him.

19. On October 20, 2022, I obtained a federal search warrant (Case # 22-51093-04) from Magistrate Judge David R. Grand to obtain real-time Enhanced 911 (E-911), Global Positioning System (GPS), and tower data for the -8694 phone number.

20. On November 3, 2022, ATF reviewed location data pursuant to the aforementioned search warrant for the -8694 phone number. The cell site tower data puts the device associated with the -8694 phone number near the locations of all four carjackings, follows:

- a. On May 12, 2022 at approximately 12:34 a.m.—approximately ten minutes before the first carjacking—the device was communicating with the cellular tower .56 miles away from the 55XX Pennsylvania Street pick-up address. On May 15, 2022 at approximately 1:10 a.m., the device was communicating with the cellular tower .58 miles away from Eaton Avenue and Birwood Avenue. This is near the location that the Detroit Police Department recovered AV-1's Ford Escape on May 19, 2022. The device only communicated with the cellular tower

serving Eaton Avenue and Birwood Avenue on May 15, 2022, and no other periods between May 12, 2022 to May 19, 2022.

- b. On June 8, 2022 at approximately 2:57 a.m., 2:59, and 3:00 a.m.— the approximately one to two minute period surrounding the second carjacking—the device was communicating with the cellular tower .43 miles away from the 40XX Field Street pick-up address. At approximately 3:29 a.m. and 3:40 a.m. — approximately thirty-one to forty-two minutes after the second carjacking— the device was communicating with a cellular towers .54 ~ .79 miles away from 15XXX Grayfield Street (approximately 19.0 miles away from Field Street). This is near the location that the Detroit Police Department recovered AV-2's Dodge Durango on June 8, 2022.
- c. On June 9, 2022 at approximately 3:21 a.m.—approximately one minute before the third carjacking—the device was communicating with the cellular tower .26 miles away from the 18XXX Gallagher pick-up location.
- d. On October 3, 2022 at between 3:08 a.m., 3:09 a.m., 3:12 a.m., 3:15 a.m., 3:17 a.m., and 3:19 a.m.—within approximately ten minutes before and one minute after the 3:18 a.m. pick-up time for the fourth carjacking—the device was communicating with the cellular

tower .47 miles away from the 18799 Wexford Street pick-up address.

At approximately 3:31 a.m. and 3:40 a.m. — approximately thirteen to twenty-two minutes after the fourth carjacking— the device was communicating with a cellular tower .45 miles away from Compass Street and Ward Avenue (approximately 8.0 miles away from Wexford Street). This is near the location that Detroit Police Department recovered AV-4's Mazda 6 on October 4, 2022.

F. Information Showing that HAILE Is Still Using the -8694 Phone Number

21. On October 25, 2022, ATF reviewed the cellular data for device associated with the -8694 phone number. The data showed the device was approximately 653m (2,154 feet) from 18XXX Hull St., Detroit, MI.

22. During the fourth week of October 2022, ATF conducted surveillance at 18XXX Hull St., Detroit, MI and saw HAILE leaving the residence through the front main entry door, and upon returning HAILE would use the same door. ATF observed this occurrence daily, during surveillance. ATF positively identified this individual as being HAILE, by comparing this individual to HAILE's Michigan State Driver's License photograph. On one occasion, on October 26, 2022 at approximately 3:10 p.m., ATF observed HAILE exit the Hull St. residence through the front main entry door, enter a gray Dodge Charger (no visible Michigan

registration plate) as the driver, and depart the residence approximately two minutes later. HAILE was the only occupant of the Dodge Charger.

23. ATF reviewed the cellular data obtained from the -8694 number relating to the aforementioned observations of HAILE. At approximately 3:07 p.m. the device was communicating with the cellular tower approximately 653m (2,154 feet) from the 18XXX Hull St. address. At approximately 3:17 p.m., after ATF observed HAILE departing the Hull St. address, the -8694 number was communicating with the cellular tower at or near an address on W. Harwood Avenue, Madison Heights, Michigan (approximately 4.8 miles away). Based on my training and experience, HAILE was in possession of a device with the -8694 number at the time ATF observed HAILE departing the Hull St. residence. Approximately five minutes later (3:17 p.m.) the -8694 number was communicating with another cellular tower, which indicates HAILE was in possession of a device with the -8694 number.

24. A review of the GPS/E-911 data for the -8694 number showed that between October 22, 2022 and November 8, 2022, between 12:00 a.m. and 8:00 a.m., the device with the -8694 phone number was within 653m ~ 719m of the 18XXX Hull St. address (403) times. I know from my training and experience, where a person and/or his device is located on a nightly basis is typically a location where a person is residing.

III. CONCLUSION

26. Based on the foregoing, probable cause exists that Darese Deandre HAILE violated 18 U.S.C. § 2119 (Carjacking). Therefore, I respectfully request that this Court issue a complaint and arrest warrant.

Respectfully submitted,



Rohit Joshi, Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means.



HON. KIMBERLY G. ALTMAN
UNITED STATES MAGISTRATE JUDGE

Date: November 10, 2022